

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA

FILED  
U.S. DISTRICT COURT  
AUGUSTA DIV.

LEVI T. WHITE

2014 JUN -2 A 10:11

PLAINTIFF

}

VS

}

CONVERGENT OUTSOURCING INC

}

Defendant

}

CLERK J. B. Buntion  
SO. DIST. OF GA.

**Case No CV 114 105**

**REQUEST FOR CLERK'S ENTRY OF DEFAULT**

Levi T. White, the Plaintiff in this case, deposes and say under penalty of perjury:

1. I am the Plaintiff in the above-entitled action. I am familiar with all the facts and circumstances in this action.
2. I make this affirmation pursuant to Rule 55.1 and 55.2(A) of the Federal Civil Rules for the Southern District of Georgia in support of Plaintiff's application of the entry of a default judgment against Defendant CONVERGENT OUTSOURCING INC.,
3. This is a action to recover statutory damages owed by the Defendant CONVERGENT OUTSOURCING INC, for violation of the Fair Credit Reporting Act, (FCRA) and the Fair Debt Collection Practices Act, (FDCPA). The Defendant is not an infant, in the military, nor an incompetent person.
4. Jurisdiction of the subject matter is base on Plaintiff at all times being a citizen of the United States and resident of Richmond County, Georgia.
5. This action was commenced on April 24, 2014 by the filing of the summons and complaint. A copy of the summons and complaint was served on the Defendant on May 7, 2014 by James Signorelli from GARY'S PROCESS SERVICE,

**INC. Service was made via United States Postal Service on May 2, 2014 requiring a signed receipt certificate number 7013 3020 0000 3503 3316 pursuant to FRCP 4 and 12 on the defendant CONVERGENT OUTSOURCING INC, located at 800 SW 39 TH ST, RENTON WA 98057. Proof of service was filed with the Clerk of the Court and the Court assigned the case number CV 114 105.**

**6. Defendant has not answered the complaint and the time to answer the complaint has expired ref FRCP 12.**

**7. This action seeks judgment for statutory damages in the amount of \$4000.00 plus cost which is justly due and no part has been paid to date.**

**WHEREFORE, Plaintiff requests the entry of Default and entry of Judgment against the Defendant.**

**Dated: In Augusta, Georgia June 2, 2014**

**Respectfully Submitted**



**Levi T. White  
2225 Morningside Dr.  
Augusta, Georgia 30904  
706-294-8822**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA

LEVI T. WHITE

PLAINTIFF

VS

**Case No CV 114 105**

CONVERGENT OUTSOURCING INC

Defendant

AFFIDAVIT OF FAILURE TO PLEAD OR DEFEND  
AS TO CONVERGENT OUTSOURCING INC,

The undersigned, being duly sworn, upon deposes and say:

1. That he is Plaintiff and has personal knowledge of the facts set forth in this affidavit;
2. That Plaintiff on April 24, 2014 filed in this action a Complaint against the Defendant including CONVERGENT OUTSOURCING INC.,
3. That the Summons for CONVERGENT OUTSOURCING INC was issued in this matter on May 2, 2014;
4. That the Summons for CONVERGENT OUTSOURCING INC issued in this matter was served on Defendant CONVERGENT OUTSOURCING INC, by James Signorelli from Gary's Process Service 14973 Interurban Ave # 201 Seattle WA 98168, on May 7, 2014;
5. That evidence of service of the Summons on CONVERGENT OUTSOURCING INC is being filed with the Court as an attachment to this Affidavit;

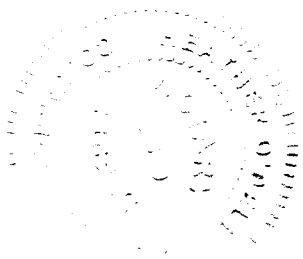
6. That not less than 21 days have elapsed since service of the Summons and Complaint upon CONVERGENT OUTSOURCING INC;
7. That examination of the Court files and records in this action shows that CONVERGENT OUTSOURCING INC, has failed to plead or otherwise defend as to Plaintiff's Complaint;
8. That this Affidavit is executed by the affiant herein for the purpose of enabling Plaintiff to obtain an Entry of Default against CONVERGENT OUTSOURCING INC for failure to plead or otherwise defend as to Plaintiff's Complaint.

 **Affiant**

**Levi T. White**

**Subscribed and sworn to before me this 2 day of June, 2014.**

Heather O'Dell Notary Public



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA

LEVI T. WHITE  
PLAINTIFF

VS  
CONVERGENT OUTSOURCING INC  
Defendant

**Case No CV 114 105**

**AFFIDAVIT IN SUPPORT OF CLERK'S ENTRY OF DEFAULT**

I hereby certify that I am the plaintiff or the attorney of record for the plaintiff in the above cause, and the defendant CONVERGENT OUTSOURCING INC was served by the following method:

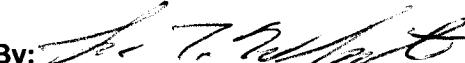
Certified Mail # 7013 3020 0000 3503 3316 by James Signorelli from GARY'S PROCESS SERVICE, INC.

I further certify that the defendant has failed to serve an answer or other responsive pleading no extension has been granted or any extension has expired; the defendant is neither an infant (under age 21) nor an incompetent person; the defendant is not in the active military service of the United States of America or its officer or agents or was not six months prior to the filing of the case.

The Clerk is requested to enter a default against said defendant.

Date June 2, 2014

Respectfully submitted

By:   
Levi T. White, Pro se  
2225 Morningside Dr.  
Augusta Ga. 30904  
nazinga58@yahoo.com  
706-294-8822

**CASE NUMBER CV 114 105**

**COST INCURRED AND STATUTORY DAMAGE**

1. UNITED STATES DISTRICT COURT SOUTHERN DISTRICT COURT FILING FEE	\$ 400.00
2. CERTIFIED MAIL POSTAGE FEE	\$ 11.60
3. GARY'S PROCESS SERVICE FEE	\$ 65.00
4. FAIR CREDIT REPORTING ACT (FCRA) SATUTORY DAMAGE TOTAL	\$3000.00
5. FAIR DEBT COLLECTION PRACTICES ACT (FDCPA) STATUTORY DAMAGE TOTAL	\$1000.00
<b>TOTAL COST INCURRED AND STATUTORY DAMAGE</b>	<b><u>\$4,476.60</u></b>

**COPY**

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

**FILED****U.S. DISTRICT COURT  
AUGUSTA DIV.**

Civil Action No.

**PROOF OF SERVICE****2014 MAY 16 P 3:19***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for (name of individual and title, if any) \_\_\_\_\_  
 was received by me on (date) \_\_\_\_\_.

**CLERK** *26*  
**CONVERGENT OUTSOURCING, INC.**  
**SU. DIST. OF GA.**

- I personally served the summons on the individual at (place) \_\_\_\_\_  
 on (date) \_\_\_\_\_; or
- I left the summons at the individual's residence or usual place of abode with (name) \_\_\_\_\_  
 , a person of suitable age and discretion who resides there,  
 on (date) \_\_\_\_\_, and mailed a copy to the individual's last known address; or
- I served the summons on (name of individual) ALUSIA STEPHENS, who is  
 designated by law to accept service of process on behalf of (name of organization)  
CONVERGENT  
OUTSOURCING on (date) 5/7/14; or
- I returned the summons unexecuted because \_\_\_\_\_; or
- Other (specify): \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date:

5/8/14*Server's signature*James Signorelli*Printed name and title**Server's address*

Additional information regarding attempted service, etc:

**RETURN OF SERVICE**

**UNITED STATES DISTRICT COURT  
SOUTHERN District of GEORGIA**

Case Number: CV114 105

Plaintiff:  
**LEVI T. WHITE**

vs.

Defendant:  
**CONVERGENT OUTSOURCING, INC**

Service Documents:  
**SUMMONS; COMPLAINT**

Received by GARY'S PROCESS SERVICE, INC. on the 2nd day of May, 2014 at 12:49 pm to be served on **CONVERGENT OUTSOURCING, INC C/O LEGAL DEPARTMENT, 800 SW 39TH ST, RENTON, WA 98057.**

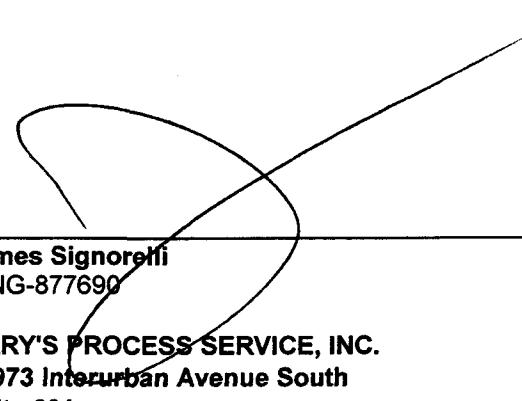
I, James Signorelli, do hereby affirm that on the **7th day of May, 2014 at 9:42 am, I:**

**PERSONALLY** delivered at the time and place set forth above, a true and correct copy of the **SUMMONS; COMPLAINT** leaving same with ALISIA STEPHENS-LEGAL DEPARTMENT-LITIGATION SUPPORT SPECIALIST .

**Description of Person Served:** Age: 30, Sex: F, Race/Skin Color: ASIAN, Height: 5'5", Weight: 110, Hair: BLACK, Glasses: N

## **RETURN OF SERVICE for CV114 105**

I declare under penalty of perjury under the laws of the State of Washington: That I am now and at all times herein mentioned a citizen of the United States and resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above entitled action and competent to be a witness therein.



James Signorelli  
KING-877690

**GARY'S PROCESS SERVICE, INC.**  
**14973 Interurban Avenue South**  
**Suite 201**  
**Tukwila, WA 98168**  
**(206) 431-5699**  
Our Job Serial Number: GPT-2014011428

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

*GARY Process Service  
14973 Interurban Ave  
#201  
Seattle WA 98168*

A. Signature

*Tasha McPherson*

Ac  Ac  
 Received by (Printed Name)  Date of  
 Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

## 3. Service Type

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Certified Mail® | <input type="checkbox"/> Priority Mail Express™         |
| <input type="checkbox"/> Registered                 | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail               | <input type="checkbox"/> Collect on Delivery            |

4. Restricted Delivery? (Extra Fee)  Yes

## 2. Article Number

(Transfer from service label)

7013 3020 0000 3503 3316

PS Form 3811, July 2010

Domestic Return Receipt

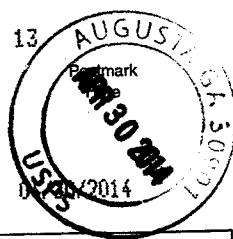
**U.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT  
(Domestic Mail Only; No Insurance Coverage Provided)**

For delivery information visit our website at [www.usps.com](http://www.usps.com)

SEATTLE WA 98168

**OFFICIAL USE**

Postage	\$	\$5.60	0605
Certified Fee		\$3.30	
Return Receipt Fee (Endorsement Required)		\$2.70	
Restricted Delivery Fee (Endorsement Required)		\$0.00	
Total Postage & Fees	\$	\$11.60	



Sent To	<i>GARY Process Service 14973 Interurban Ave Seattle WA 98168</i>
Street, Apt. No.; or PO Box No.	
City, State, ZIP+4	

PS Form 3800, August 2006

See Reverse for Instructions

USPS AUGUSTA MAIN POST OFFICE AUGUSTA, Georgia 309019998 1254920605 -0099 04/30/2014 (706)823-3113 03:12:35 PM		
Product Description	Sales Receipt Sale Qty	Unit Price
00 SEATTLE WA 98168-4610		\$5.60
Zone-8		
Priority Mail 2-Day		
Flat Rate Env		
4.00 oz.		
Expected Delivery: Fri 05/02/14		
Includes \$50 insurance		
Return Rcpt (Green Card)		\$2.70
00 Certified		\$3.30
USPS Certified Mail #:		
70133020000035033316		
=====		
Issue PVI:		\$11.60
=====		
Total:		\$11.60
Paid by:		
Cash		\$12.00
Change Due:		-\$0.40

00 For tracking or inquiries go to USPS.com or call 1-800-222-1811.  
 \*\*\*\*\*  
 \*\*\*\*\*  
 BRIGHTEN SOMEONE'S MAILBOX. Greeting cards available for purchase at select Post Offices.  
 \*\*\*\*\*  
 \*\*\*\*\*

\*\* Save this receipt as evidence of insurance. For information on filing an insurance claim go to [usps.com/shop/file-domestic-claims.htm](http://usps.com/shop/file-domestic-claims.htm).

Order stamps at [usps.com/shop](http://usps.com/shop) or call 1-800-Stamp24. Go to [usps.com/clicknship](http://usps.com/clicknship) to print shipping labels with postage. For other information call 1-800-ASK-USPS.  
 \*\*\*\*\*  
 \*\*\*\*\*  
 Get your mail when and where you want it with a secure Post Office Box. Sign up for a box online at [usps.com/poboxes](http://usps.com/poboxes).  
 \*\*\*\*\*  
 \*\*\*\*\*

Bill#: 1000100620342  
 Clerk: 13

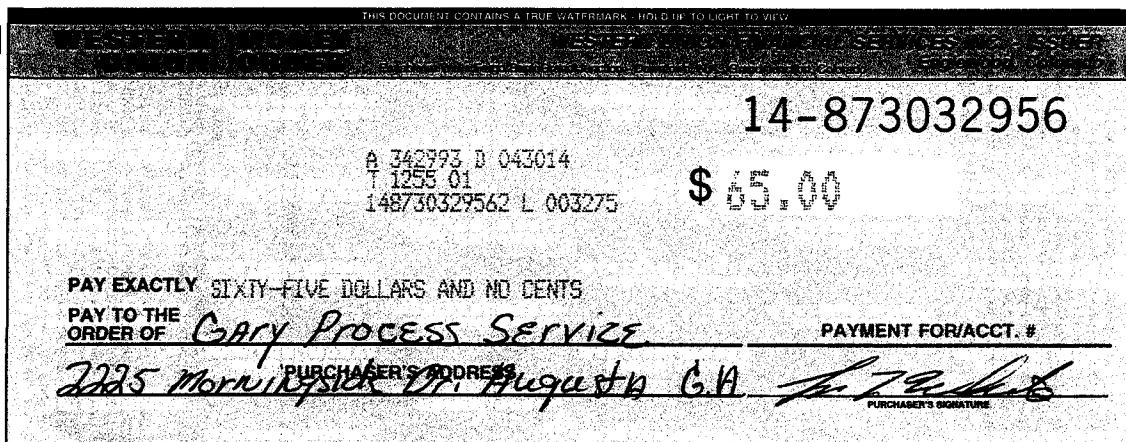
All sales final on stamps and postage  
 Refunds for guaranteed services only  
 Thank you for your business

HELP US SERVE YOU BETTER

Go to: <https://postalexperience.com/Pos>

TELL US ABOUT YOUR RECENT  
 POSTAL EXPERIENCE

YOUR OPINION COUNTS



MONEY ORDER RECEIPT - NON NEGOTIABLE

ACT 342993 LOC 003275 DT 043014 \$65.00 65DOLLARS AND NO CENTS

Payable to:

RETAIN THIS MONEY ORDER RECEIPT. IT MUST BE INCLUDED WITH ALL REFUND REQUESTS. BE SURE TO READ IMPORTANT INFORMATION BELOW AND ON BACK.

PURCHASE AGREEMENT: You the purchaser agree that Western Union Financial Services Inc. (WUFSI) need not stop payment on this Money Order and may cash it at any WUFSI Money Order office. If you fill in the back of the Money Order at the time of purchase, and (2) you report the loss or theft to Western Union Financial Services Inc. in writing immediately. (3) You provide WUFSI with this original Money Order receipt issued by Western Union Financial Services Inc., Englewood, Colorado. For customer service, call 1-800-999-9660.

\* 1 4 8 7 3 0 3 2 9 5 6 \*



► LOAD THIS DIRECTION, THIS SIDE UP

► LOAD THIS DIRECTION, THIS SIDE UP

**GARY'S PROCESS SERVICE, INC.**  
**14973 Interurban Avenue South**  
**Suite 201**  
**Tukwila, WA 98168**  
**Phone: (206) 431-5699**  
**Fax: (206) 431-5695**

**INVOICE**

Invoice #GPT-2014011428

5/8/2014



Levi White  
 225 Morningside Dr  
 Augusta, GA 30904

**Case Number: SOUTHERN CV114 105**

**Plaintiff:**  
**LEVI T. WHITE**

**Defendant:**  
**CONVERGENT OUTSOURCING, INC**

Received: 5/2/2014 Served: 5/7/2014 9:42 am GPS/PERSONAL / CORP. SERVICE  
 To be served on: CONVERGENT OUTSOURCING, INC C/O LEGAL DEPARTMENT

**ITEMIZED LISTING**

Line Item	Quantity	Price	Amount
Service Fee (Local)	1.00	65.00	65.00
<b>TOTAL CHARGED:</b>			<b>\$65.00</b>
05/02/2014      #14-873032956      Pre-Payment			65.00
<b>BALANCE DUE:</b>			<b>\$0.00</b>

**Thank you for your business!**

If paying off this invoice please include a copy with your check.  
 Visit [garysprocessservice.com](http://garysprocessservice.com) for status and request for service forms.

## CERTIFICATE OF SERVICE

The true and correct copy of the foregoing documents was sent to the below named parties by Certified Mail # 7013 3020 0000 3503 3323.

Signed JUNE 2, 2014



**ALISIA STEPHEN  
LEGAL DEPARTMENT -LITIGATION SUPPORT SPECIALIST  
CONVERGENT OUTSOURING INC  
800 SW 39TH ST  
RENTON WA 98057  
1-206-264-1267  
1-206-322-4500**